



SDMS DocID

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**NORTHROP GRUMMAN**

Northrop Grumman Corporation  
1840 Century Park East  
Los Angeles, California 90067-2199

Joseph P. Kwan  
310-556-4514  
Joe.Kwan@ngc.com

January 23, 2006

**By Email and Overnight Delivery**

Mr. Harry Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
Office of Regional Counsel  
Remedial Enforcement Support Section  
77 West Jackson Boulevard (C-14J)  
Chicago, Illinois 60604-3590

**RE: Section 104(e) Information Request Response of Northrop Grumman Systems Corporation  
- Safety-Light Site**

Dear Mr. Steinmetz:

Enclosed please find a response to the Information Request referenced above. This response is timely because it is submitted on January 23, 2005, the extended due date as confirmed in our November 29, 2005, letter to you and subsequent emails.

The attached response reflects all the information that has been gathered to date. We will supplement our response if we discover that any portion is incomplete and/or inaccurate. The attached response is complete, true and correct to the best of our information, knowledge and belief.

Any requests, questions or communications concerning this response should be forwarded to Eileen B. Salathé Gernhard, Senior Counsel -- Environment, at 703-875-8537. Her address is:

Eileen B. Salathé Gernhard  
Senior Counsel -- Environmental Law  
Northrop Grumman Corporation  
1000 Wilson Boulevard, Suite 2300  
Arlington, Virginia 22209  
(703) 875-8537  
(703) 875-8347 (fax)  
eileen.salathegernhard@ngc.com

Sincerely,



Joseph P. Kwan  
Director, Environmental Remediation

Enclosures

**Response of Northrop Grumman Systems Corporation**  
**to Section 104(e) Information Request**  
**Safety-Light Site**

**Introduction**

This response is submitted on behalf of the Electronic Systems (ES) and Integrated Systems (IS) sectors of Northrop Grumman Systems Corporation (NGSC).

**General Objections**

NGSC submits the following general objections to the Information Request:

1. For purposes of responding to the Information Request, NGSC's search for information has been limited, in general, to appropriate subject matter files in its possession, custody or control. The ground for this limitation is that any broader search by NGSC would cause undue burden and expense and would be oppressive.
2. NGSC objects to the Information Request insofar as it calls for or purports to call for any information that is privileged against disclosure through the attorney-client privilege and/or the work-product privilege, or is otherwise immune from production.
3. NGSC objects to the Information Request insofar as it seeks information contained in documents equally available to the United States Environmental Protection Agency from the files of federal, state and/or local agencies. Obtaining such documents directly from such sources is more convenient, less burdensome and oppressive and less expensive than seeking them from NGSC.
4. NGSC objects to the Information Request on the grounds and to the extent that:
  - (a) information sought is not relevant to the Safety-Light Corporation (SLC) Site;
  - (b) requests included in the Information Request are overbroad in that they are beyond the scope of the issues relevant to the SLC Site;
  - (d) requests included in the Information Request are unreasonable, unduly burdensome and oppressive and expensive; and
  - (e) requests included in the Information Request are vague and ambiguous with respect to various terms included therein.
5. NGSC objects to the Information Request to the extent the requests are unintelligible or compound, conjunctive or disjunctive.
6. NGSC objects to the use of ambiguous and undefined terms.

7. NGSC objects to the Information Request to the extent that it seeks personal information regarding current NGSC employees, including home addresses and telephone numbers.

NGSC expressly reserves the right to supplement its Response to the Information Request if, when and to the extent that NGSC believes that it is able to supplement or revise its responses to any or all of the Requests included in the Information Request.

## RESPONSES

### **General Response**

NGSC incorporates by reference all of the General Objections set forth above into each of the Specific Responses set forth below.

### **Specific Responses**

#### Question 1

1. Describe in detail the business relationship between Northrop and Safety Light.

#### Response to Question 1

The NGSC IS sector has conducted an internal search regarding the ledger sheets from 1955, 1956 and 1957 that were appended to the information request. The NGSC IS sector has been unable to find any records or any persons currently or formerly employed by Northrop Aircraft with information about Northrop Aircraft's business relationship with SLC's predecessor as evidenced by the ledger sheets from 1955, 1956 and 1957. NGSC does not deny that Northrop Aircraft held one or more licenses from the Atomic Energy Commission at its facility in Hawthorne, California during the relevant time period, but we are unable to confirm whether that facility purchased "Isolites" and, if so, from what supplier.

The NGSC ES sector has a current business relationship with SLC. SLC is a sole source supplier to ES for a highly specialized process known as "tritiation of radioactive rods." This process is utilized for the production of Receiver Protectors, which are critical assemblies in the operation of all tracking and fire control radars. These radars are utilized on numerous major Defense platforms and Air Traffic Control systems that NGSC provides to the United States government. Our nation's defense and homeland security rely upon on the performance of these systems. According to our records, it appears that this business relationship may extend back to approximately 1971, but at this point we cannot document it further back than that. We are researching additional records/information related to this business relationship, but have not been able to identify/retrieve such records/information in the time period allowed. We will supplement this response if we discover that any portion is incomplete and/or inaccurate.

#### Question 2

2. Did Northrop ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR metals, Metreal or Isolite to the Site?

Response to Question 2

Upon information and belief, NGSC has not transported or brokered any hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site.

Question 3

3. If you answered "yes" to Question 2, please answer the following questions:....

Response to Question 3

Not applicable.

Question 4

4. Did Northrop ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?

Response to Question 4

Upon information and belief, NGSC has not generated radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site.

Question 5

5. If you answered "yes" to Question 4, please address the following issues:...

Response to Question 5

Not applicable.

Question 6

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses and telephone numbers of such persons as well as additional information or documents they may have.

Response to Question 6

NGSC is without knowledge as to the subject matter of this Information Request.

Question 7

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, current addresses and telephone numbers of the persons from whom such information or documents may be obtained

Response to Question 7

NGSC is without knowledge as to the subject matter of this Information Request.

Question 8

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response to Question 8

NGSC is without knowledge as to the subject matter of this Information Request.

Question 9

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:....

Response to Question 9

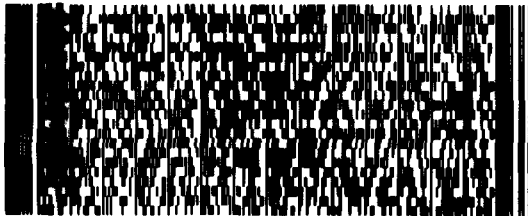
Not applicable.

From: Origin ID: (703)875-8537  
Eileen Salathe Gernhard  
Northrop Grumman Corporation  
1000 Wilson Boulevard  
Suite 2300  
Arlington, VA 22209



CL 98 12286/14/18

SHIP TO: (215)814-3161 **BILL SENDER**  
**Mr. Harry Steinmetz 3HS62**  
**USEPA Region 3**  
**USEPA Region 3**  
**1650 Arch Street**  
**Philadelphia, PA 191032029**



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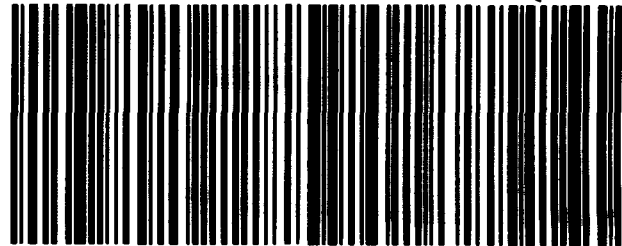
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